

Exhibit 4

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

DEPARTMENT S-29

HON. PETER J. MIRICH, JUDGE

LAOSD ASBESTOS CASES)	JCCP CASE NO. 4674
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)	
ROBERT BLINKINSOP, AN INDIVIDUAL,)	
KAREN BLINKINSOP, AN INDIVIDUAL,)	CASE NO. BC677764
)	
PLAINTIFFS,)	
)	P.M. SESSION
VS.)	
)	
ALBERTSONS COMPANIES, INC., ET)	
AL.,)	
)	
DEFENDANTS.)	
_____)	

Certified Transcript

REPORTER'S TRANSCRIPT OF PROCEEDINGS
WEDNESDAY, MARCH 13, 2019; P.M. SESSION

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1 **THE WITNESS:** You're welcome.

2 **THE COURT:** Thank you.

3 You may inquire.

4 **MS. ROMANO:** Thank you, your Honor.

5

6 CROSS-EXAMINATION

7 **BY MS. ROMANO:**

8 **Q.** Hi, Dr. Moline. Are you ready to continue?

9 **A.** Yes, I am.

10 **Q.** Okay, great.

11 Just to be clear, you are not one of

12 **Mr. Blinkinsop's treating physicians, true?**

13 **A.** That is correct.

14 **Q.** You have not been involved with any of

15 **Mr. Blinkinsop's diagnosis, treatment, or care.**

16 **A.** Correct.

17 **Q.** You are here testifying today not as a treating
18 doctor but as a paid witness on behalf of the plaintiffs,
19 true?

20 **A.** Correct.

21 **Q.** And I think you told us on direct that
22 plaintiff law firms like Mr. Bratt's are charged \$600 an hour
23 for your time?

24 **A.** Correct.

25 **Q.** You've been testifying as a paid expert in
26 asbestos litigation for over 20 years now, true?

27 **A.** Yes.

28 **Q.** And I think you've estimated that you testify

1 in asbestos cases about once a month. Sometimes more,
2 sometimes less.

3 Is that fair?

4 A. Um, over the past four years, it's averaged
5 about eight times a year. So it's a little less than once a
6 month. Sometimes I may testify more frequently, and then I
7 have four months where I don't testify.

8 Q. Understood. All of your testimony in asbestos
9 cases, though, 100 percent is on behalf of plaintiffs and
10 plaintiff lawyers, true?

11 A. Yes.

12 Q. And over the years you've been testifying for
13 plaintiffs in asbestos litigation, you've made millions of
14 dollars doing that work, true?

15 A. Yes.

16 Q. You talked a little bit about this on direct.
17 But over the course of your 28-year career as an occupational
18 medicine doctor, you've seen and interviewed literally
19 hundreds, if not hundreds and hundreds of people, with
20 asbestos-related diseases, true?

21 A. Yes.

22 Q. But before being hired by plaintiffs' lawyers
23 to testify in cosmetic talc cases, you never once attributed
24 any of those hundreds of asbestos-related diseases to cosmetic
25 talc, true?

26 A. They had other exposures. I did not. That is
27 correct.

28 Q. And in the past you have attributed

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I, MARK SCHWEITZER, OFFICIAL COURT REPORTER PRO TEM
OF THE SUPERIOR COURT OF THE STATE OF CALIFORNIA, COUNTY OF
LOS ANGELES, DO HEREBY CERTIFY THAT THE FOREGOING TRANSCRIPT,
DATED WEDNESDAY, MARCH 13, 2019, P.M. SESSION, COMPRISES A
FULL, TRUE, AND CORRECT TRANSCRIPT OF THE PROCEEDINGS HELD IN
THE ABOVE-ENTITLED CAUSE.

DATED THIS 13TH DAY OF MARCH, 2019.

MARK SCHWEITZER, RPR, CRR, CSR NO. 10514